

**SUMMARY OF THE  
ACCREDITATION PROCESS COMMITTEE MEETING  
OCTOBER 18, 2000**

The Accreditation Process Committee of the National Environmental Laboratory Accreditation Conference (NELAC) met by teleconference on Wednesday October 18, 2000, at 1 p.m. Eastern Daylight Time (EDT). The meeting was led by its chair, Ms. Janet Cruse of the Illinois Environmental Protection Agency (IL EPA). A list of action items is given in Attachment A. A list of participants is given in Attachment B. *The purpose of the meeting was to discuss proposed language from the NELAC Field Activities Committee concerning the accreditation procedures and requirements for mobile laboratories.*

**INTRODUCTION**

Ms. Cruse began the meeting by introducing those committee members present on the teleconference as well as four guests from the NELAC Field Activities Committee. Mr. Dan Bivins, chair of the Field Activities Committee, as well as Mr. Andy Tintle, Mr. Pete Law and Dr. Bart Simmons were present on the teleconference to discuss previously submitted suggested changes to Chapter 4 of the NELAC Standard.

**SUGGESTED CHANGES TO CHAPTER 4**

The suggested changes as received from the Field Activities Committee are given in Attachment C. Those anticipated suggestions were additions and deletions to Sections 4.0, 4.1.2, and 4.1.4 concerning the primary and secondary accreditation requirements for field measurement units and mobile laboratories.

Section 4.0, paragraph a in the current accepted language states that “noncontiguous laboratory status shall be determined by the primary accrediting authority when noncontiguous facilities operate under the same ownership oversight, technical directorship, and quality system as the parent laboratory.”

The proposed language from the Field Activities Committee concerning Section 4.0, suggested the replacement of Section 4.0 paragraphs b, c, d, and e with the following sentences. The wording is as follows:

- b) Separate accreditation is required for mobile laboratories. Separate accreditation is not required for field measurements which are under the scope of accreditation and quality system for a fixed-base or mobile laboratory.
- c) An organization that operates several mobile laboratories may apply for a single accreditation for the sum of all fields of testing for which its mobile laboratory expects to operate.

The proposed language was discussed by members of both committees, with Mr. Law citing examples of the groups this would affect positively. The field measurement of stack emissions

was the most frequently mentioned type, but both committees acknowledged that there were numerous hand-held or suitcase-sized equipment field measurements currently and those would increase with technology advancing rapidly. Mr. Law and Mr. Bivins voiced concern that requiring every vehicle or field measurement unit to acquire a separate accreditation would be economically devastating to most companies currently performing field measurements. The discussion turned to attempting to reach a compromise between the current accreditation requirements in Section 4.0 of the NELAC Standard and the proposed language from the Field Activities Committee. Suggestions included a corporate accreditation for each entity, covering all field or mobile units owned therein and modifying the current PT sample analysis schedule, rather than at the current interval. There were suggestions from both committees that laboratory directors prove proficiency through analyzing PT samples for the fields of testing for which their mobile or field units desire accreditation. Ms. Cruse reminded everyone that NELAC does not accredit individuals as such and that even though the NELAC primary accreditation application requires staff/personnel to be listed and current, there was a great difference between accrediting individuals and listing staff on an application form. Mr. Nick Macelletti also reminded members of the two committees of past NELAC meetings where several states were adamant in their concern about mobile labs crossing their state borders and analyzing samples without the confidence and verification that the mobile or field unit had been accredited by their home state, and had secondary accreditation with the state from which samples were taken. Ms. Cruse also pointed out the economic unfairness to many accrediting authorities where the single corporate accreditation of laboratories with numerous mobile or field units would require on-site inspections and PT samples for each field unit without the accrediting authority recouping fees from each of the mobile laboratories through a separate accreditation.

Both committees agreed that there was also a need to better define the term “field measurement” in relation to mobile laboratories as the current NELAC glossary definition is broad and not specific enough to separate mobile laboratories and field units when considering accreditation requirements for field measurements such as stack emissions.

Dr. Simmons suggested that since the California Department of Health Services had suggestions that were very different from those proposed by the Field Activities Committee that he would contact Ms. Jane Jensen from that agency and discuss a compromise that would be acceptable to them as well as the companies currently performing field measurements on stack emissions. Dr. Simmons is hopeful that he and Ms. Jensen will draft new proposed language for consideration at the upcoming Sixth NELAC Interim Meeting (NELAC 6i).

The two committees agreed that a portion of their scheduled meeting time at NELAC 6i should be spent discussing the issue of field measurements and mobile laboratory accreditation requirements. Mr. Bivins agreed that on Wednesday, November 1, 2000 from 3 to 5 p.m. during the afternoon session of the Field Activities Committee Meeting, the Accreditation Process Committee should join them for that purpose. Mr. Bivins will contact Ms. Jeanne Hankins for approval.

## **ADJOURNMENT**

After closing discussions and thanking the committee members and guests present, Ms. Cruse adjourned the meeting.

**ACTION ITEMS  
ACCREDITATION PROCESS COMMITTEE MEETING  
OCTOBER 18, 2000**

<b>Item No.</b>	<b>Action</b>	<b>Date to be Completed</b>
1.	Mr. Bart Simmons will contact Ms. Jane Jensen of the California Department of Health Services to discuss their concerns on accreditation requirements for mobile laboratories and field measurement units.	11/1/00
2.	Mr. Dan Bivins will contact Ms. Jeanne Hankins for approval to join the Field Activities Committee Meeting at the Sixth NELAC Interim Meeting on November 1, 2000 from 3-5 p.m. to continue discussions on field measurements and mobile laboratory accreditation.	11/1/00

**PARTICIPANTS  
ACCREDITATION PROCESS COMMITTEE MEETING  
OCTOBER 18, 2000**

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**DRAFT**

October 16, 2000

Field Activities Committee (Bart Simmons)

[proposed changes to Chapter 1 Appendix A - GLOSSARY]

**Field Measurements:** Environmental testing done at a temporary field location or site under the scope of accreditation of a fixed-base or mobile laboratory.

**Fixed-Base Laboratory:** A laboratory which operates in a permanent location.

**Mobile Laboratory:** A laboratory which operates in a non-permanent location Any facility requiring accreditation that analyzes or tests environmental samples and is capable of moving or being moved from one site to another. - jjd.

[proposed change to Chapter 4 - Accreditation Process]

Laboratories applying for accreditation may be fixed-base or mobile. Separate accreditation is not required for field measurements which are under the scope of accreditation and the quality system for a fixed-base or mobile laboratory.

Suggested changes from Pete Law(10/16/00) are in yellow and green highlight.

Suggested changes that are highlighted in blue are from Bart Simmons but are incorporated into sections by Dan Bivins on 10/16/00

Accreditation Process Standard - Section 4.0 (mobile lab language) - June 2000

**4.0 ACCREDITATION PROCESS**

(NB. MANY OF THE STANDARDS AND ELEMENTS LISTED IN THIS CHAPTER ARE REFLECTIVE OF STANDARDS SET FORTH IN CHAPTERS DEALING WITH DETAILED EXPLANATIONS OF THESE ELEMENTS. THEREFORE, IT IS ANTICIPATED THAT SOME OF THE DETAILS MAY CHANGE AS THE DISCUSSIONS AND CONCLUSIONS IN THESE CHAPTERS CHANGE.)

Laboratories applying for accreditation may be fixed-base or mobile.

a) An individual fixed-base laboratory requires a separate accreditation. The primary accrediting authority shall determine what constitutes an individual fixed-base laboratory when noncontiguous laboratory facilities operate under the same ownership, technical directorship, and quality system as the parent laboratory.

b) The primary accrediting authority shall determine if a separate accreditation is required for a mobile laboratory that is owned by an accredited fixed-base laboratory, operates under the same quality system as the fixed-based laboratory, performs a subset of the analyses for which the

fixed-base laboratory is accredited, and operates exclusively within the state in which the parent fixed-base laboratory is located.

c) Separate accreditation by the primary accrediting authority is required for a mobile laboratory that is owned by an accredited fixed-base laboratory, operates under the same a quality system as the fixed-based laboratory, performs a subset of the analyses for which the fixed-base laboratory is accredited, and operates outside of the state in which the parent fixed-base laboratory is located.

d) Separate accreditation by the primary accrediting authority is required for a mobile laboratory that is owned by a fixed-base laboratory but operates under a different quality system or performs analyses for which the parent fixed-base laboratory is not accredited.

e) Separate accreditation by the primary accrediting authority is required for a mobile laboratory that is not owned and operated by a fixed-base laboratory.

**Replace above, b, c, d & e with .... ????-jjd**

**b) Separate accreditation is required for mobile laboratories. Separate accreditation is not required for field measurements which are under the scope of accreditation and quality system for a fixed-base or mobile laboratory.**

**c) An organization that operates several mobile laboratories may apply for a single accreditation for the sum of all fields of testing and test categories ( --jjd) for which its mobile laboratories expect have demonstrated capabilities ( - jjd) to operate and are identified in the organization's Quality Manual (--jjd).**

*That's it for this section.*

*But also change the following sections as noted; (please note, these changes are based on the July 1999 standards – there may very well have been changes made to section numbers, etc. this past year however I was not able to locate a copy of the most recent standards. I think the following at least provides for an outline of what my thoughts are.*

Sec 4.1.2, 1<sup>st</sup> Paragraph, Sentence 3.

The on-site assessment of each accredited laboratory must be performed a minimum one time per two years with the exception of mobile laboratories. The primary Accrediting Authority may opt to perform a single assessment of a mobile laboratory operation in assessment of the ability to operate multiple mobile laboratories of like configuration (--jjd).

Sec 4.1.4, Proficiency Testing Samples

b) When a fixed- base laboratory initially requests accreditation, it must successfully analyze two sets of PT samples, the analyses to be performed no less than ( - jjd) 30 calendar days apart. Each set shall contain one sample for each requested field of testing (program-matrix-analyte). When a laboratory has been granted accreditation status, it must

maintain a history of at least two passing results of the most recent three for each field of testing (program-matrix-analyte). **The requirements outlined in this section (section 4.1.4 d only ??? - iid) do not apply to mobile laboratories. Mobile laboratories are outlined in Section 4.1.4.e.**

- b) **When a mobile laboratory initially requests accreditation, whether for a single or multiple mobile laboratories, they must submit two passing PTs for each field of testing (program-matrix-analyte) for which accreditation is requested. These PT samples are not required to be performed on at a specific site, but must be performed utilizing the normal instrumentation, vehicle and/or trailer, and personnel that are used to perform the routine analyses. These PT samples may be analyzed less than 30 days apart. The PT results are site-independent (i.e. PT results from each site, for each mobile operation, are not required, nor is the mobile laboratory to be physically on a specific site when running the PT). When a mobile laboratory has been granted accreditation status, it must maintain a history of at least two passing results of the most recent three for each field of testing (program-matrix-analyte) in order to continue maintain accreditation for each analyte expected in that new field of testing (-iid). If a mobile laboratory with existing accreditation elects to add a field of testing, the mobile laboratory must submit one passing PT sample prior to granting of accreditation. This section does not apply to field measurements which are under the scope of accreditation and quality system for a fixed-- base or mobile laboratory.**

**Current section e becomes f.**